

# **WISCONSIN LEGISLATIVE COUNCIL STAFF**

## ***RULES CLEARINGHOUSE***

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## **CLEARINGHOUSE RULE 00-124**

### **Comments**

**[NOTE: All citations to “Manual” in the comments below are to the Administrative Rules Procedures Manual, prepared by the Revisor of Statutes Bureau and the Legislative Council Staff, dated September 1998.]**

### **2. Form, Style and Placement in Administrative Code**

a. Section Chir 3.09 is not mentioned in the department’s analysis. It should be described there. Regarding the use of the abbreviation “CPR” in that section, see s. 1.01 (8), Manual. Should the requirement of this section be referred to in current s. Chir 3.02 (1)?

b. It is suggested that consideration be given to combining paragraphs (b) and (c) of s. Chir 5.01 into one paragraph.

### **5. Clarity, Grammar, Punctuation and Use of Plain Language**

a. The department’s analysis indicates that clarification is made that continuing education requirements do not apply in the first biennium following initial licensure. However, s. Chir 5.01 (1) (d) appears to indicate that the continuing education requirements do indeed apply during that period. Note, too, that s. 446.02 (1) (b), Stats., provides that during the time between initial licensure and commencement of a full two-year licensure period, new licensees are not required to meet continuing education requirements; this is not equivalent to providing that continuing education requirements do not apply in the first biennium following initial licensure.

b. In s. Chir 5.01 (1) (b), it appears that the reference to “December 31, 2001” should be to “December 31, 2002.”

c. In s. Chir 5.01 (1) (c), is the term “boundary issues” sufficiently understood that no definition or explanatory note need be provided?